

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MICHELLE CARTER

Case No. 17-cv-539 (AMD)(SLT)

Plaintiff,

-against-

JP MORGAN CHASE BANK, N.A.,

**THIRD-PARTY DEFENDANT
AMMAR Y. AWAWDEH
DEMANDS A TRIAL BY JURY**

Defendant.
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JP MORGAN CHASE BANK, N.A.,

Plaintiff,

-against-

DAHALEEL 1, INC. d/b/a ROCKAWAY FARM
DELI & GRILL, et. al.

**ANSWER TO THIRD-PARTY
COMPLAINT**

Defendant.
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Defendant, **AMMAR Y. AWAWDEH**, by his attorneys, ALI NAJMI, ESQ. answering the third-party Complaint, respectfully alleges as follows upon information and belief:

1. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “1” of the third-party complaint.
2. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “2” of the third-party complaint.
3. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “3” of the third-party complaint.
4. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “4” of the third-party complaint, except that Ammar Y. Awawdeh received \$80,000.00 via check.
5. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “5” of the third-party complaint.

6. Denies the allegations contained in paragraph “6” of the third-party complaint as to Ammar Y. Awawdeh.

7. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “7” of the third-party complaint.

8. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “8” of the third-party complaint.

9. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “9” of the third-party complaint.

10. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “10” of the third-party complaint.

11. Denies the allegations contained in paragraph “11” of the third-party complaint.

12. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “12” of the third-party complaint.

13. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “13” of the third-party complaint.

14. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “14” of the third-party complaint.

15. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “15” of the third-party complaint.

16. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “16” of the third-party complaint.

17. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “17” of the third-party complaint.

18. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “18” of the third-party complaint.

19. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “19” of the third-party complaint.

20. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “20” of the third-party complaint.

21. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “21” of the third-party complaint.

22. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “22” of the third-party complaint.

23. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “23” of the third-party complaint.

24. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “24” of the third-party complaint.

25. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “25” of the third-party complaint.

26. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “26” of the third-party complaint.

27. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “27” of the third-party complaint.

28. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “28” of the third-party complaint.

29. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “29” of the third-party complaint.

30. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “30” of the third-party complaint.

31. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “31” of the third-party complaint.

32. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “32” of the third-party complaint.

33. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “33” of the third-party complaint.

34. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “34” of the third-party complaint.

ANSWERING THE FIRST CAUSE OF ACTION

35. In response to paragraph “35” of the third-party complaint, Defendant AMMAR Y. AWAWDEH repeats and realleges each and every response to paragraphs “1” through “34” of the third-party complaint with the same force and effect as though fully set forth herein.

36. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “36” of the third-party complaint.

37. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “37” of the third-party complaint.

38. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “38” of the third-party complaint.

39. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “39” of the third-party complaint.

40. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “40” of the third-party complaint.

ANSWERING THE SECOND CAUSE OF ACTION

41. In response to paragraph “41” of the third-party complaint, Defendant AMMAR Y. AWAWDEH repeats and realleges each and every response to paragraphs “1” through “40” of the third-party complaint with the same force and effect as though fully set forth herein.

42. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “42” of the third-party complaint.

ANSWERING THE THIRD CAUSE OF ACTION

43. In response to paragraph “43” of the third-party complaint, Defendant AMMAR Y. AWAUDEH repeats and realleges each and every response to paragraphs “1” through “42” of the third-party complaint with the same force and effect as though fully set forth herein.

44. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “44” of the third-party complaint.

45. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “45” of the third-party complaint.

46. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph “46” of the third-party complaint.

47. Denies the allegations contained in paragraph “47” of the third-party complaint as to Ammar Y. Awawdeh.

ANSWERING THE FOURTH CAUSE OF ACTION

48. In response to paragraph “48” of the third-party complaint, Defendant AMMAR Y. AWAUDEH repeats and realleges each and every response to paragraphs “1” through “47” of the third-party complaint with the same force and effect as though fully set forth herein.

49. Denies the allegations contained in paragraph “49” of the third-party complaint as to Ammar Y. Awawdeh.

50. Denies the allegations contained in paragraph “50” of the third-party complaint as to Ammar Y. Awawdeh.

51. Denies the allegations contained in paragraph “51” of the third-party complaint as to Ammar Y. Awawdeh.

ANSWERING THE FIFTH CAUSE OF ACTION

52. In response to paragraph “52” of the third-party complaint, Defendant AMMAR Y. AWAUDEH repeats and realleges each and every response to paragraphs “1” through “51” of the third-party complaint with the same force and effect as though fully set forth herein.

53. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph "53" of the third-party complaint.

54. Denies having knowledge or information sufficient to form a belief as to the allegations contained in paragraph "54" of the third-party complaint.

55. Denies the allegations contained in paragraph "55" of the third-party complaint as to Ammar Y. Awawdeh.

56. Denies the allegations contained in paragraph "56" of the third-party complaint as to Ammar Y. Awawdeh.

AFFIRMATIVE DEFENSES

57. The Complaint fails to state a cause of action upon which relief may be granted against AMMAR Y. AWAUDEH.

WHEREFORE, third-party Defendant, AMMAR Y. AWAUDEH, demands judgment dismissing the Complaint, together with reasonable costs and disbursements of this action including reasonable attorneys' fees and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
April 9, 2018

Yours, etc.,

THE LAW OFFICE OF ALI NAJMI
Attorneys for third-party Defendant AMMAR Y.
AWAUDEH

By:


ALI NAJMI, ESQ.
261 Madison Avenue 12th floor
New York, New York 10016
(212) 401-6222

TO: All Parties and Counsel via ECF

VERIFICATION

STATE OF NEW YORK)

ss.:

COUNTY OF NEW YORK)

I, the undersigned, am an attorney admitted to practice in the Courts of New York State, and say that: I am associated with the firm of the attorneys of record for the third-party defendant, AMMAR Y. AWAUDEH. I have read the annexed verified answer to the plaintiff's third-party complaint, know the contents thereof and the same to be true to my knowledge, except those matters therein which are stated to be alleged upon information and belief, and as to those matters therein not stated upon knowledge, based upon the documents and information in our files.

I affirm that the foregoing statements are true under penalties of perjury.

Dated: New York, New York
April 9, 2018



ALI NAJMI